

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

SHANIKA CROWLEY,

Plaintiff,

v.

FPI MANAGEMENT, INC., and
ELLEN RICHARDS,

Defendants.

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Case No. 24-cv-00544-CVE-MTS

UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendants, FPI Management, Inc. and Ellen Richards, by counsel and pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and the LCvR7-1(g), hereby move for an extension of time within which to file a responsive pleading to Plaintiff's Complaint. In support of this Unopposed Motion for Extension of Time, Defendants state the following:

1. On November 7, 2024, Plaintiff filed her initial Complaint. ECF. No. 1.
2. On November 12, 2024, the Court dismissed Plaintiff's Complaint for failure to state a claim. ECF No. 4.
3. The Court later granted Plaintiff's Motion to Reconsider, leading to Plaintiff filing her Amended Complaint on January 17, 2025. ECF Nos. 19, 21.
4. Defendants received service of the Amended Complaint on January 30, 2025. ECF. No. 28.
5. Defendants' deadline to file a responsive pleading is February 20, 2025.
6. Counsel for Defendants has communicated with counsel for Plaintiff, who has agreed, and consents, to an extension of time for Defendants to file a responsive pleading until March 20, 2025.

7. Accordingly, Defendants respectfully move the Court to extend the deadline for responsive pleadings to March 20, 2025.

8. No previous motions to extend this deadline have been made.

9. Parties have begun to explore early resolution of the case, and the requested extension of time will allow further discussions to occur.

10. As demonstrated by the fact that Plaintiff consents to this Motion and no Scheduling Order has been entered in the case, the requested extension will neither prejudice Plaintiff nor result in undue delay.

11. A proposed order has been submitted for the Court's consideration.

WHEREFORE, for the foregoing reasons, Defendants respectfully request that the Court grant this Unopposed Motion for Extension of Time; enter an order extending the time for Defendants to file a responsive pleading to March 20, 2025; and grant such other relief the Court deems proper.

Dated: February 17, 2025

Respectfully submitted,

FPI MANAGEMENT, INC.
ELLEN RICHARDS

/s/ Brooks Cain
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